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July 22, 2019

ELECTRONICALLY FILED

Hon. Pamela K. Chen  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Webb, et al.,  
15-Cr.-252 (PKC) (RML)

In re Seizure of Approximately \$72,000 Seized  
From JP Morgan Chase Bank N.A. Account  
Number 312316513 Held in the Name of  
Ram G, and All Proceeds Traceable Thereto,  
16-Misc.-255 (RML)

Dear Judge Chen:

This Firm represents Romiro Gutierrez and Ram G Construction, an entity run by Mr. Gutierrez. As the Court is aware, the government seized approximately \$72,000 from my clients' account back in 2015 pursuant to a seizure warrant. We write to follow up on our letter motion, asking the Court to enforce an extra-judicial settlement agreement made between my clients and the United States for the return of \$14,400, to order the government to pay funds in a timely fashion, and to explain the extraordinary delay in having done so to date. Lo and behold, on July 16, just a few days after the Court ordered the government to respond, we received the clients' due payment of \$14,400. To that extent, we respectfully withdraw as moot the portion of our motion that seeks the return of funds, with our gratitude and thanks to the Court for stepping in.

Respectfully submitted,



Duncan P. Levin, Esq.  
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cc: All parties (via ECF)